

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
vs.)	No. 3:16-CR-20
)	(Collier/Guyton)
MARK HAZELWOOD et al.,)	
Defendant)	

MOTION REQUESTING MODIFICATION OF TERMS OF RELEASE

Mark Hazelwood, through counsel, files this motion requesting the Court to modify the terms of his release to substitute his third-party custodian to permit Mrs. Hazelwood to travel on December 5-8, 2019.

I. FACTUAL BACKGROUND

This Court has granted Mr. Hazelwood's prior requests to have substitute third-party custodians step in during his wife's travel. Most recently, on September 24, 2019, this Court granted permission to have a substitute third-party custodian from September 27-29, October 5-6, and October 11-23, 2019. (Doc. 902).

During each previous modification to Mr. Hazelwood's conditions, he has scrupulously abided each and every instruction from the Probation Office. We again ask the Court to modify Mr. Hazelwood's bail to permit a substitute third-party custodian to permit Mrs. Hazelwood to travel.

We request that Asa Hazelwood, Mr. Hazelwood's son, be permitted to step in as third-party custodian from December 5-8, 2019.

II. MODIFICATION REQUEST

A. December 5-8, 2019

Mrs. Hazelwood is scheduled to travel on December 5, 2019 and return December 8, 2019.

To facilitate her travel back and forth for this trip, Mr. Hazelwood's son, Asa Hazelwood, has agreed to step in as third-party custodian. He will be informed of his duties and will sign the bond conditions.

Counsel for the government was consulted and advised that the government defers to the discretion of the Court. I have also spoken to Pretrial Services who defers to the Court.

WHEREFORE, Mr. Hazelwood requests that this Honorable Court enter an Order modifying the conditions of his release allowing Mr. Hazelwood to substitute his third-party custodian from December 5-8, 2019.

DATED: Knoxville, Tennessee
November 25, 2019

Respectfully submitted,

s/ Bradley L. Henry
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CERTIFICATE OF SERVICE

I hereby certify that, on November 25, 2019, a true and correct copy of the foregoing document was filed on CM/ECF with the U.S. District Court for the Eastern District of Tennessee. Notice of this filing was served on all CM/ECF parties.

/s/ Bradley L. Henry